

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1:16-CR-322
	:	
v.	:	(Judge Rambo)
	:	
KEVIN HOLLAND,	:	
Defendant	:	

DEFENDANT’S UNOPPOSED MOTION
TO EXTEND PRETRIAL MOTIONS DEADLINE AND
CONTINUE JURY SELECTION AND TRIAL

AND NOW, this 28th day of November, 2016, comes the above-named defendant, Kevin Holland, by and through his attorney, Wendy J. F. Grella, Esquire and files this Unopposed Motion to Extend Pretrial Motions Deadline and to Continue Jury Selection and Trial and in support thereof respectfully avers the following:

1. By Indictment filed August November 2, 2016, Kevin Holland was charged with Possession with Intent to Distribute Cocaine Base in violation of 21 U.S.C. §841(a)(1) and 841(b)(1)(B), Using, Carrying, or Possessing a Firearm During and in Relation to a Crime of Violence or Drug Trafficking Crime in violation of 18 U.S.C. §924(c), and Felon in Possession of Firearm in violation of 18 U.S.C. §922(g)(1).
2. On November 8, 2016, Mr. Holland appeared before the Honorable Martin C. Carlson and entered a plea of not guilty to the Indictment.
3. Trial in this matter is scheduled to commence January 3, 2017 and Pretrial Motions are due on or before November 29, 2016.
4. Counsel is awaiting receipt of discovery documents relevant to this case and will need ample time to review such with her client.

5. Additionally, plea negotiations soon may commence in this matter thus, it is respectfully requested that the pretrial motions deadline be continued for at least 30 days and that jury selection and trial be scheduled thereafter.
6. On Monday, November 28, 2016, undersigned counsel received an email from Assistant United States Attorney Joseph Terz which indicated he concurred with the granting of this motion.

WHEREFORE, undersigned counsel respectfully requests Your Honorable Court grant the within Motion, extend the deadline for filing pretrial motions, and continue jury selection and trial in this matter.

Respectfully Submitted,

s/ Wendy J. F. Grella, Esquire
Wendy J. F. Grella, Esquire
Attorney for Defendant
Sup. Ct. I.D. #85164
1119 North Front Street
Suite 1
Harrisburg, PA 17102
(717) 576-0549

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CERTIFICATE OF CONCURRENCE

I, Wendy J. F. Grella, Esquire hereby certify that on Monday, November 28, 2016, I received an email from Assistant United States Attorney Joseph Terz which indicated his concurrence with the granting of the foregoing Motion to Extend Pretrial Motions Deadline and Continue Jury Selection and Trial.

DATE: November 28, 2016

s/Wendy J. F. Grella, Esquire
Wendy J. F. Grella, Esquire
1119 North Front Street
Suite 1
Harrisburg, PA 17102
(717) 576-0549

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of November, 2016, I caused the foregoing document to be filed via ECF and that Assistant United States Attorney Joseph Terz is a filing user under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document, and no additional service upon the filing user is required.

Date: November 28, 2016

s/Wendy J. F. Grella
Wendy J. F. Grella, Esquire
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